

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division

G.G. ,

Plaintiff,

v.

Case No. 4:15-cv-00054-RGD-TEM

GLOUCESTER COUNTY SCHOOL
BOARD,

Defendant.

MOTION TO DISMISS

NOW COMES the Defendant Gloucester County School Board (“School Board”), by counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6) and moves this Court to dismiss, with prejudice, the entire Complaint filed by the Plaintiff. The Complaint does not state a claim upon which relief can be granted as a matter of law, and does not allege facts sufficient to establish a legally cognizable cause of action. The School Board relies upon, and incorporates its Brief in Support of the Motion to Dismiss as if fully set forth herein.

WHEREFORE, Defendant Gloucester County School Board respectfully requests that this Court enter an Order granting the Motion to Dismiss and dismissing the Complaint with prejudice, and award costs and attorney fees as allowed by law.

**GLOUCESTER COUNTY SCHOOL
BOARD**

By Counsel

/s/

David P. Corrigan
VSB 26341
Jeremy D. Capps
VSB No. 43909
M. Scott Fisher, Jr.
VSB 78485
Attorney for Gloucester County School Board
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com

CERTIFICATE

I hereby certify that on the 7th day of July, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Rebecca K. Glenberg, Esq.
American Civil Liberties Union of Virginia Foundation, Inc.
701 E. Franklin Street
Suite 1412
Richmond, VA 23219
804-644-8080 - Phone
804-649-2733 - Fax
rglenberg@acluva.org

Gail Deady, Esq.
ACLU
701 E. Franklin Street
Suite 1412
Richmond, VA 23219
804-644-8080 - Phone
804-649-2733 - Fax
gdeady@acluva.org

Joshua A. Block, American Civil Liberties Union
125 Broad Street
18th Floor
New York, NY 10004
212-549-2500 - Phone
212-549-2650 - Fax

Leslie Cooper, American Civil Liberties Union Foundation
125 Broad Street
18th Floor
New York, NY 10004
212-549-2500 - Phone
212-549-2650 - Fax

/s/ _____
David P. Corrigan
VSB 26341
Attorney for Gloucester County School Board
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com